

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**DAVID E. MACK,**

**Plaintiff,**

**v.**

**FIRSTSOURCE ADVANTAGE, LLC**

**Defendant.**

§  
§  
§  
§  
§  
§  
§  
§

**CASE NO. 4:11-cv-731**

**MOTION FOR ENLARGEMENT OF TIME TO  
RESPOND TO PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT JUDGMENT**

TO THE HONORABLE JUDGE OF THIS COURT:

Defendant, Firstsource Advantage, LLC, files this Motion for Enlargement of Time, and in support thereof would show:

1. Plaintiff filed a Motion for Entry of Default Judgment on December 9, 2011;
2. Defendant is required to file a response to the motion no later than close of business December 27, 2011;
3. Defense counsel was retained December 22, 2011, and has not had sufficient time to confer with his client and develop an understanding of the facts in this matter.
4. Further, Defendant's counsel is in process of relocating offices and will not have access to office equipment until December 27, 2011.
5. Defendant requests a fourteen day enlargement of time to file its answer or otherwise plead.

WHEREFORE, Defendant respectfully requests that the Court grant the enlargement of time as requested, and for such other and further relief, both at law and in equity, to which this Defendant may be justly and legally entitled.

Respectfully submitted,

**BUSH AND RAMIREZ, LLC**

//s// Keith Wier

Keith Wier; SBN: 21436100

Fed. ID No.: 7930

5615 Kirby Dr., Suite 900

Houston, TX 77005

Telephone: (713) 626-1555

Facsimile: (713) 622-8077

**ATTORNEY FOR DEFENDANT  
FIRSTSOURCE ADVANTAGE, LLC**

**CERTIFICATE OF CONFERENCE**

I certify that I was unable to confer with Plaintiff, David Mack, about this motion before filing because no telephone contact information was available. The undersigned will attempt to obtain that information and contact Plaintiff at a later date.

//s// Keith Wier

**CERTIFICATE OF SERVICE**

I hereby certify that on the 22<sup>nd</sup> day of December, 2011, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

David E. Mack  
7720 McCallum Blvd., #2099  
Dallas, TX 75252

//s// Keith Wier

Keith Wier